

# EXHIBIT 54

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION OPIATE  
LITIGATION

This document relates to:  
*Track One Cases*

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF TRICIA GLOVER**

I, Tricia Glover, declare, upon personal knowledge and under penalty of perjury, that the following is true and correct:

1. I am a Vice President, North American Chief Compliance Officer for Teva Pharmaceuticals USA, Inc. (“Teva USA”). I have served in this role and as VP/Compliance Officer for Global Specialty Medicines since July of 2012. I have knowledge of the facts of the stated herein, including the compliance program governing sales and marketing at Teva USA.
2. Teva USA became affiliated with Cephalon, Inc. (“Cephalon”) in October 2011.
3. In January 2012, Cephalon and Teva USA aligned their internal compliance policies and procedures and communicated them to employees within the companies.
4. Since I started at Teva USA in July 2012, Cephalon and Teva USA have continued to maintain and enforce robust internal policies to ensure compliance with FDA requirements and other laws as to all aspects of promotion and marketing, including, but not limited, to policies addressing advertising and promotional materials (including their review by

the regulatory, legal, and medical departments), gifts and meals for healthcare practitioners, funding for third-party programs, and promotional meetings. These policies were in existence at Cephalon and Teva USA before July 2012 and have continued to be refined and enforced. They were incorporated into a single US policy for Cephalon and Teva USA that continues to remain into effect.

5. Since July 2012, I have not received any reports of any improper promotional or marketing activities on behalf of Teva USA or Cephalon in Ohio, including with respect to any off-label detailing by sales representatives for Cephalon or Teva USA regarding any opioid medicine. I am not aware of any instances of any false, misleading, and/or off-label promotion of opioid medicines by speakers, sales representatives, or anyone else on behalf of Cephalon and Teva USA in Ohio during that time.

6. Cephalon and Teva USA (after 2011) have provided grants and other financial support for medical education meetings, conferences, and other programs conducted by third parties, including professional organizations. Cephalon and Teva USA always had policies in place to ensure the independence of such programs and any publications associated with those programs. I am unaware of any instances where these policies were not followed or where Teva USA or Cephalon ever influenced the content of any such programs or publications.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 28, 2019.

By:

  
Tricia Glover